Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	DB Docket No. 04-296
Review of the Emergency Alert System	)	
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	)	
	)	

COMMENTS
OF
CORR WIRELESS COMMUNICATIONS, LLC

Corr Wireless Communications, L.L.C. (ACorr@) hereby submits these comments on the Commission=s proposal to make the Emergency Alert System (AEAS@) more efficient and effective. Corr is a wireless telecommunications carrier in northern Alabama, and its comments will therefore be directed exclusively to that portion of the NPRM which considers expansion of the EAS to common carrier networks, including cellular and PCS systems. Specifically, at paragraphs 31-32 of the NPRM, the Commission sought comment on whether emergency messages should be transmitted over wireline or wireless phone networks in addition to traditional broadcast and cable television media. Corr strongly believes that it would be harmful to the public interest to mandate the kind of broadcast-over-cellular warnings contemplated by the NPRM.

Neither cellular nor wireline telephone networks are designed to accommodate simultaneous Abroadcasting@ of messages to entire subscriber bases. Rather, they are designed with the assumption that only a relatively small percentage of the phones will be in use at any one time. In Docket 04-35, the Commission recently calculated that wireless systems are

designed to serve a maximum of one-eighth of their subscriber pool at any one time. *In the Matter of New Part Four of the Commission=s Rules Concerning Disruptions to Communications*, Docket 04-35, FCC 04-188, released August 19, 2004. While that figure is probably high, it illustrates the fact that telephone communications, whether wired or wireless, are primarily two-way, point-to-point, and intermittent. These features are what permit modern phone systems to work efficiently while meeting normal demand. Any deviation from that pattern would instantly cause the entire network to crash because it could not possibly handle the call volume.

The problem of network overload is even greater for wireless networks than for wireline ones. Consider, for example, the treatment of roamers. At any given time a substantial number of subscribers to a cellular system are roaming in other markets. In a local emergency, those people would have no immediate need to be alerted to danger. Yet the cellular system would automatically try to track and locate them wherever they were. This would not only seriously overload the capacity of the network but would also create significant long distance charges which would ultimately have to be paid for by the consumer.

In Corr=s case, and presumably in the case of many other carriers with similar network designs, implementation of an EAS notification process would be especially debilitating. Corr investigated the effect of EAS implementation and found that to do so would necessitate the suspension of advanced frequency-hopping technology which permits Corr to optimize its use of available spectrum. Without this feature, Corr would be severely constrained in its ability to provide topnotch service using its present spectrum capacity. Since the introduction of EAS would be incompatible with frequency hopping, the two features cannot co-exist.

In this respect, the Commission=s proposal is actually *counterproductive* to its intended purpose. As the nation discovered on September 11, 2001, in an emergency people have an extraordinary need not to find out about the emergency but to contact and coordinate with their families in response to the emergency. The undersigned, for example, found himself on 9/11 not far from the Pentagon crash site in Arlington trying to contact his children at their school in northwest Washington. Because the cellular lines were so heavily used, he got only busy

signals the entire morning and afternoon. Had the local Sprint PCS network been obligated to alert all of its subscribers to the disaster, the precious capacity would have been drained even further at just the point when people were needing to use that capacity for important private communications.

Here the Commission=s proposal is well intentioned but unnecessary. The broadcast system is designed expressly for *broadcasting*, *i.e.*, for disseminating information to thousands of people efficiently, indiscriminately, instantly, and over wide areas. That is precisely the task which an EAS system must accomplish. By contrast, common carrier telephone networks are designed to let individuals have person to person private conversations. This latter function in an emergency is probably almost as important as the initial alarm; private communications are how the alarm gets reacted to and addressed. By shoe-horning the phone network into a role for which it was not designed and which it cannot sustain, the Commission might actually do more harm than good.

While it is true, as the NPRM notes, that the broadcast EAS system only reaches those persons with access to a TV or radio when the emergency is happening, it is also true that the Internet has become an important source of information for millions of people while they are home, at the office and at school. In a sense, the Internet has become an ancillary broadcast medium which can fill in the information gap for people who temporarily have no access to TV or radio. The widespread availability of this new source of emergency information dramatically reduces the need at the office and at school for a substitute for broadcast emergency alerts during the business day.

For these reasons, Corr urges the Commission not to impose a requirement that wireless carriers in particular deliver emergency alert messages. That job should be left to the media which are designed for such communications.

Respectfully submitted,

CORR WIRELESS COMMUNICATIONS, L.L.C.

By:_____/S/_____
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